

ALBERT J. SOLER | Partner | Entertainment, Sports, Media, Intellectual Property, Litigation
asoler@sh-law.com
Phone: 212-784-6914

DELIVERED VIA ECF FILING

February 19, 2024

MEMO ENDORSED

The Honorable Katherin Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Tel: (212) 805-0290
Email: Failla_NYSDChamers@nysd.uscourts.gov

Re: *Bush Baby Zamagate, Inc. v. Chapter 4 Corp., d/b/a Supreme, et. al.*
Case Number: 1:23-cv-08946-KPF

Your Honor:

Our firm represents Kejuan Muchita Inc., a co-defendant in the above-captioned matter. We respectfully submit this letter, with consent of all counsel for Plaintiff Bush Baby Zamagate, Inc. (“Plaintiff”) and Defendants Chapter 4 Corp., d/b/a Supreme, Kejuan Muchita Inc., and The Executors of the Albert Jackson Johnson Estate (collectively, “Defendants”) in this matter respectfully requesting a further two (2) week continuance so that the parties may continue to finalize resolution and settlement of this dispute. The parties are pleased to inform the Court that the parties are in the final stages of resolution of this matter and are in the process of finalizing and executing a formal settlement agreement.

The Court previously granted the parties a continuance of the Extension of Time to File Defendants’ Answer pursuant to Your Honor’s Order dated December 18, 2023 (ECF No. 21), as well as a continuance of the Initial Pretrial Conference pursuant to Fed. R. Civ. P. 16 (the “Rule 16 Conference”) on December 21, 2023 pursuant to Your Honor’s Order dated October 30, 2023 (ECF No. 16). The Court granted the parties a further continuance of Defendants’ Time to File an Answer, from January 18, 2024 to February 19, 2024, on pursuant to Your Honor’s January 17, 2024 Order (ECF No. 24).

The requested two (2) week continuance would extend Defendants’ Time to File an Answer in this matter from February 19, 2024 to March 4, 2024 and adjourn the Initial Pretrial Conference

accordingly (i.e., the Initial Pretrial Conference was adjourned sine die by the Court on October 30, 2023).

Thank you, in advance, for your consideration and the parties expect that no further continuances and/or adjournments will be required and that this matter will be settled and resolved within the next two (2) weeks. The parties will inform the Court of any further developments with respect to settlement and resolution of this matter.

Respectfully Submitted,

/AJS/

Albert J. Soler
Attorneys for Defendant Kejuan Muchita Inc.

cc: All Counsel of Record (via ECF)

Application GRANTED. Defendants shall answer, move, or otherwise respond to the Complaint on or before **March 4, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 27.

Dated: February 20, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE